

Universal Service

39. To better satisfy general Congressional concerns about universal services, particularly those related to public health, the Commission should take steps to expand the availability of ratings services to homes not equipped with "V-chip" TV sets scheduled to reach the market in 1998. Set-top units incorporating blocking technologies are now being installed in growing numbers in homes served by cable and satellite, and prospectively by telco's and broadcast stations. One third of these set-tops are likely to be in homes with children under fourteen according to an OKTV analysis. These advanced set-tops are already being distributed and for many years will be available in substantially greater numbers than TV sets equipped with V-chips.

40. OKTV studies indicate that blocking circuits in most of these devices are capable of being activated by the proposed universal protocol. In a few instances, software may have to be modified. In others, competing uses for memory or processing circuits may interfere with parental use for blocking inappropriate programs unless the industry under Commission supervision establishes appropriate priorities, as it presumably will do for line 21 of the Extended Data Service. The strong public interest and clear Congressional intent to enable parents to protect their children is expressed not only in Section 551 and 552 of the 1996 Act, but also in "safe harbor" statutes, regulations and numerous court decisions. The abundant evidence of the compelling nature of this public interest underscores that the industry, subject to Commission review, should assure that advanced set-tops can be used for this purpose on a priority basis. Clearly the industry should assure that rating codes distributed in line 21 can actuate blocking circuits in these devices as well as blocking circuits in future TV sets.

41. There is an additional reason for such an initiative. OKTV intends to distribute codes through out-of-band channels in cooperation with providers of electronic program guides and electronic TV schedule information, such as the Preview Channel,

StarSight, Tribune Media, TV Guide, and TV Data. These measures will enable blocking codes to be available to parents when the vertical blanking interval line 21 in certain set-tops technically cannot do so. Also, incipient digital television transmissions to set-tops converting digital to analog signals for display on current TV sets, will require attention to assure they will be compatible with a universal ratings protocol and will distribute rating codes with appropriate priority.

42. Many lower income parents for a decade and more will not have either a new TV set incorporating a "V-chip" circuit or an advanced set-top incorporating blocking features. OKTV has conceptualized a design for an inexpensive set-top whose primary purpose is to enable parents inexpensively and conveniently to obtain access to a rating service of their choice. Consideration has been given to costs and sources for volume production, and to their low-cost distribution through nonprofit entities. OKTV believes that parents can be provided with such set-tops free of charge or for a low subsidized price.

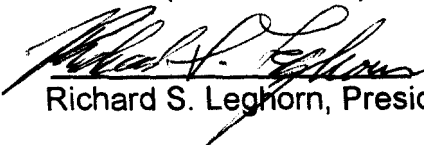
43. The broadcasting industry during Congressional debate prior to adoption of the V-chip provisions of Section 551 committed \$2 million to develop just such a "set-top." And statutory language to support such an approach was proposed by Congressman Coburn during the "V-chip" debate. Although defeated in favor of the V-chip proposal, Congressional encouragement for such approaches to help low-income families was incorporated specifically in Section 552 of the 1996 Act. While Congress did not mandate action by the Commission in this regard, the Commission could further this Congressional intent by conducting an inquiry to encourage private actions in this regard, to inform all parties concerned of voluntary steps that have been taken or may be contemplated by the television industry in furthering its commitment, and otherwise to advance the purposes of Section 552.

Conclusions

Both the TV industry and government are institutionally incapable of adequately helping parents protect their children from potentially harmful television. Industry is limited in doing so by its imperative to serve free markets. Government is limited in doing so by the imperative of the First Amendment

Only a national non-profit, health based service, such as OKTV is discussing with other parties, can adequately meet this pressing public need.

Respectfully submitted,
The Children's Television Consortium
d.b.a. OKTV™ (Our Kid's TV)

By: 
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April 7, 1997

Appendix A

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The Electronics Industries Association first sent the proposed standards revision of EIA-608 on February 12, 1996 for an acceptance vote by its membership. Called EIA-608A, it added the field 2 services to the original Closed Captioning Standard. The deadline for the comment period was May 28, 1996. The work was prepared by the EIA R-4.3 subcommittee on television data systems. At that time, the standard contained two bytes of program rating data as section 05h of Part 6, "Extended Data Service Packets". These were aimed at televised motion pictures and contained the MPAA rating for the film and content advisories jointly developed and used by HBO and Showtime for violence, sexual content and mature content.

When the telecommunications bill passed, and a "V-chip" standard was mandated by Congress, this two byte section of 608A was removed from the standard pending the outcome of the various committees' work on a new rating system. This leaves the door open for a new standard which will serve both the industry and the consumer in the best possible way.

From an operational standpoint, two key factors override. First is the amount of data in the packet, and the second is the repetition rate of the data during the program. These two factors control the latency from the time a channel is requested by the viewer to the time the picture appears. It is not sufficient to have the data present only at the start of the program. The picture will not appear until the data is received and compared to the desired setting. The data must be continually transmitted to ensure availability to the receiver as quickly as possible.

Countering this demand is the need for sufficient data and requirements for the other services carried by line 21 field two. The data packet must be long enough to contain as much information as necessary to make the system useful to consumers and yet not take up all of the bandwidth of the channel. It is with these constraints in mind that the following two proposals are offered. In the first I have provided for the information originally in 608A, the proposed data of the Valenti Implementation Group, and an open platform for other independent rating organizations to disseminate their data as separate sections of the data packet. The second version combines the data by not differentiating between industry and independent ratings. The second version is the more efficient of the two.

Version 1

Definitions

MPAA rating: Active only if the program is a film, codes must contain both NR (not rated) and N/A not applicable to differentiate between a movie that has not been rated, and a program that is not a movie. Size: 3 bits mp0, mp1, mp2

Valenti Implementation Group ratings (Industry ratings): This currently contains six categories, and should also contain codes for N/A for not applicable (like news and sports which are not rated) and NR for programs which have not been rated yet. Size 3 bits tv0, tv1, tv2

Independent Ratings supplier ID: The size of this data will depend on the number of ratings supplier can reasonably be anticipated. Assume 3 bits for now, giving 8 suppliers. Id0, id1, id2

Independent Ratings data: Assume 6 categories plus NR and N/A. Size 3 bits ir0, ir1, ir2

Explanatory Data Identifier: A required overhead datum indicating that optional data follows.

Explanatory Data: This data could be used to expand on the Independent Ratings data, to indicate the reasons for the rating and to give content advisories. Assume five categories with up to eight levels each.

Using EIA-608A protocol for line 21 field 2 as a standard the following data transmission groupings evolve. Note that because the ratings data is not ASCII, then bit 6 must be set to a 1. This results in an effective byte size of six bits.

Data definitions

MPAA movie ratings

mp2	mp1	mp0	rating
0	0	0	N/A
0	0	1	G
0	1	0	PG
0	1	1	PG-13
1	0	0	R
1	0	1	NC-17
1	1	0	X
1	1	1	NR

TV Industry ratings

tv2	tv1	tv0	rating
0	0	0	N/A
0	0	1	TVY
0	1	0	TVY17
0	1	1	TVG
1	0	0	TVPG
1	0	1	TV14
1	1	0	TVM
1	1	1	NR

Movie content advisories from the original 608A proposal

v1	v0	Advisory level
0	0	no violent content
0	1	V1
1	0	V2
1	1	V3

s1	s0	Advisory level
0	0	no sexual content
0	1	S1
1	0	S2
1	1	S3

m1	m0	Advisory level
0	0	no mature content
0	1	M1
1	0	M2
1	1	M3

An example of an independent rating would be that of OKTV. Using its protocol as an example, the independent byte would be defined as follows.

Independent rater ID

id2	id1	id0	group
0	0	0	tbd
0	0	1	OKTV
0	1	0	tbd
0	1	1	tbd
1	0	0	tbd
1	0	1	tbd
1	1	0	tbd
1	1	1	tbd

OKTV rating example

ir2	ir1	ir0	rating
0	0	0	N/A
0	0	1	OK toddlers
0	1	0	OK 3 and over
0	1	1	3 and over Co-view
1	0	0	OK 8 and over
1	0	1	8 and over Co-view
1	1	0	reserved for future
1	1	1	not rated

Following the age rating of the independent agency, would be a 3 byte field containing sufficient information for defining the basis for the rating. Five categories are allowed for.

Violence				Sexual content				Language			
ev2	ev1	ev0	rating	es2	es1	es0	rating	el2	el1	el0	rating
0	0	0	N/A	0	0	0	N/A	0	0	0	N/A
0	0	1	none	0	0	1	none	0	0	1	none
0	1	0		0	1	0		0	1	0	
0	1	1		0	1	1		0	1	1	
1	0	0		1	0	0		1	0	0	
1	0	1		1	0	1		1	0	1	
1	1	0	extreme	1	1	0	extreme	1	1	0	extreme
1	1	1	NR	1	1	1	NR	1	1	1	NR

Horror				Illegal or harmful acts			
eh2	eh1	eh0	rating	ei2	ei1	ei0	rating
0	0	0	N/A	0	0	0	N/A
0	0	1	none	0	0	1	none
0	1	0		0	1	0	
0	1	1		0	1	1	
1	0	0		1	0	0	
1	0	1		1	0	1	
1	1	0	extreme	1	1	0	extreme
1	1	1	NR	1	1	1	NR

Timing and latency considerations are of utmost importance. The optimal system contains enough data to actuate blocking switches and explain the ratings being offered, and does so in a timely manner which does not significantly degrade the perceived operation of the television set. The following offers some rough examples of the time required to transmit this proposed data set under three conditions, 1 independent rater, 4 independent raters, and the unlikely example of 8 independent rating systems all transmitting at once.

Assuming two extra bytes for housekeeping, the timing comes out as follows.

raters	bytes	lines	total time to transmit
1	8	4	266 mS
4	20	10	660 mS
8	36	18	1.2 Sec.

As can be seen, a repetition rate of every 5 seconds or so would not present a problem. At that rate a viewer would have to wait an average of 2.5 seconds for the television to tune to a channel while the v-chip function is active. A rate of 3 seconds would lower the average latency to 1.5 seconds. This is long by tuner design standards, but would only occur when the television has the v-chip activated.

Version 2

Ratings supplier ID: The size of this data will depend on the number of ratings suppliers can reasonably be anticipated. Assume 3 bits for now, giving 8 suppliers. Id0, id1, id2

Ratings data: Assume 6 categories plus NR and N/A. Size 3 bits r0, r1, r2

Explanatory Data: This data could be used to expand on the Independent Ratings data, to indicate the reasons for the rating and to give content advisories. Assume six categories with up to eight levels each.

Using EIA-608A transmission protocol for line 21 field 2 as a standard the following data transmission groupings evolve. Note that because the ratings data is not ASCII, then bit 6 must be set to a 1. This results in an effective byte size of six bits

Transmission protocol

Character	b6	b5	b4	b3	b2	b1	b0
independent id and rating	1	ID2	ID1	ID0	R2	R1	R0
Explanatory data byte 1	1	V2	V1	V0	S2	S1	S0
Explanatory data byte 2	1	L2	L1	L0	H2	H1	H0
Explanatory data byte 3	1	I2	I1	I0	n2	n1	n0

Independent rater ID

ld2	id1	id0	group
0	0	0	TV Industry
0	0	1	MPAA
0	1	0	OKTV
0	1	1	tbd
1	0	0	tbd
1	0	1	tbd
1	1	0	tbd
1	1	1	tbd

Violence

V2	V1	V0	rating
0	0	0	N/A
0	0	1	none
0	1	0	
0	1	1	
1	0	0	
1	0	1	
1	1	0	extreme
1	1	1	NR

Sexual content

s2	s1	s0	rating
0	0	0	N/A
0	0	1	none
0	1	0	
0	1	1	
1	0	0	
1	0	1	
1	1	0	extreme
1	1	1	NR

Horror

h2	h1	h0	rating
0	0	0	N/A
0	0	1	none
0	1	0	
0	1	1	
1	0	0	
1	0	1	
1	1	0	extreme
1	1	1	NR

Illegal or harmful acts

i2	i1	i0	rating
0	0	0	N/A
0	0	1	none
0	1	0	
0	1	1	
1	0	0	
1	0	1	
1	1	0	extreme
1	1	1	NR

Language			
L2	L1	L0	rating
0	0	0	N/A
0	0	1	none
0	1	0	
0	1	1	
1	0	0	
1	0	1	
1	1	0	extreme
1	1	1	NR

nudity			
n2	n1	n0	rating
0	0	0	N/A
0	0	1	none
0	1	0	
0	1	1	
1	0	0	
1	0	1	
1	1	0	extreme
1	1	1	NR

For version 2 of the protocol the timing calculations yield a shorter time for transmission by two bytes for each example. This will decrease the latency further from the version 1 examples given above.

Assuming two extra bytes for housekeeping, the timing comes out as follows.

raters	bytes	lines	total time to transmit
1	6	3	199mS
4	18	9	599 mS
8	34	17	1.13 Sec.

This proposal designed and prepared by:
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 March 31, 1997

**The Children's Television Consortium
doing business as OKTV™**

Part I.

**Pilot Test Results
Sample Content Reports**

Part II.

Overview of the OKTV Standards and Appraisal Process

Part II.

**Terms used in the Standards and Appraisal Questions
Overview of the Manual for OKTV Appraisers**

Part I.

Pilot Test Results

OKTV conducted a pilot test from June 1996 through December 1996. Programs were selected randomly airing between the hours of 6 AM and 9 PM. of a selection of children's and family television programming for that season. The genres used for the pilot test appraisals were cartoons, music and storytelling, puppets, real comedy, situation comedy, slapstick, science fiction, drama, action adventure, and suspense.

Appraisers were trained on the use of the Standards, definitions of terms and the appraisal questions. Assignments with instructions required appraisers to view four out of six episodes of a series. Teams of appraisers viewed the same episode of a series independently. This provided a measure of interrater reliability, quality control, accuracy across all episodes in a series, and to obtain an optimal amount of detail pertaining to each of the appraised programs.

Most significantly the pilot test revealed that:

- the rater questions are observable and reliable
- reliability among raters can consistently be achieved
- ratings accurately identified inappropriate and appropriate content for children at various developmental levels that is easily understandable and can be conveyed to parents.

Analysis of the appraisal process showed several ways to view information for each of the six OKTV content categories. All of the aspects the appraisal process is based on the overall content information recorded for each appraised program. After appraisal is complete appraisers enter for each of the six content categories an audience designation code indicating the level of acceptability for children's viewing.

Overall, the pilot test appraisals identified an audience group for older children more often than for younger children. This is important because it showed fewer choices for the youngest of children. In addition, the results showed a significant number of "children's" programs, identified by the TV industry as either TV Y, TV7, or G, were appraised by OKTV and received program codes as "No Kid's" because of the amount of harmful content found during the appraisal process.

Other codes applied were an OKT code which indicates Co-Viewing only because OKTV assumes that no infant or toddler should be left alone to view TV. Appraisals of preschool programs generated either

an OKT (infants and toddlers with Co-Viewing) or OK3 code indicating that the content was within the levels of acceptability for infant, toddler, or preschool viewers. However, some appraisals indicated that certain programs are more suitable for three year olds and older because of an occasional scene depicting negative or harmful behavior. In these cases the program received either an OK3 or an OKC3 code suggesting that Co-Viewing may be needed for some programs for children who have not yet internalized community based standards of what is right and what is wrong.

Because OKTV uses the most restrictive code across all categories to determine a final rating, and an appraisal closest to harm-free as possible, several programs in the pilot test received a “No Kid’s” rating. This meant several things to OKTV:

- That final ratings reflect an appraisal process that assess children’s programming utilizing all of the six content categories in reaching a final code. Thus final codes reflect a the program’s overall content.
- That depending the type of content within the context of the program, OKTV final ratings of programs may not be able to produce sufficient choices for the youngest of viewers.
- The possibility of an override decision of a program’s appraisal arose, and it was decided that an override can occur to mediate the final OKTV rating, especially if the program is grounded in historical depictions, or if the appraisal was conducted incorrectly.
- Ratings reviews by OKTV Staff provide quality control and assurance over all final ratings.

The data from the pilot test is able to generate hundreds of reports for both internal purposes and for public dissemination. The next three pages are samples of individual program *Content Reports*. These reports identify the program, the final OKTV rating code for blocking technology, compare OKTV’s rating with the TV industry’s rating and provide an overview of the content observed during the appraisal process. The content information in these reports are based on the information from the appraisal process for each content category across all of the episodes in a series that was appraised. The information in these reports is not even close to the enormous amount of information that was collected from each program’s appraisal.

Program: Taz Mania
Genre: Cartoon
Network: WFXT (FOX)

OKTV Appraisal:	NO Kids	Violence, Horror, Harmful Behaviors, Language
Industry Rating:	TVY	Acceptable for children of all ages

OBSERVABLE CONTENT in PROGRAM

- | | |
|---------------------------|---|
| V) Violence | Physical force with the intent to cause harm with no negative consequences. Violence as an accepted alternative to interpersonal conflicts. |
| H) Horror | Harm/threats towards feeling being with no help to the victim by the end of the episode. Formal features such as close-ups used to enhance violent acts. |
| I) Illegal/Harmful | Program neglects to portray negative aspects of activities; over-eating, driving fast in car, hangs head out of car while in motion. No negative consequences for acts; kicks, hitting people, destruction of property/objects..... |
| S) Sexual | "She-Taz" Devil character tries to seduce Taz. |
| L) Language | Stereotyping language not repudiated and no negative consequences to the abusive speaker; old "geezer", you "simpleton", Elderly portrayed as feeble, cranky, slow, who dress in diapers; makes fun of a father's "butt". |
| N) Nudity | NONE |

OKTV COMMENT

- Patterns emerged across the appraisal of multiple episodes that showed negative stereotypes, the portrayals of females and the elderly often used in this cartoon can model anti-social behavior for impressionable children.
- The often sibling rivalry between Taz and his sister depicts violent, harmful behaviors, which can be imitated by younger viewers, thus placing them at risk.

NOTE: *The OKTV Appraisal Process is organized to identify program content that places children at-risk of harm based on credible scientific and social research. The process produces a Content Report, explanatory descriptors, and an overall OKTV rating related to children's developmental stages. More in-depth reports regarding content information and the appraisal process for each appraised programs can be made available. Dissemination of these results are discussed in an OKTV document under preparation.*

Program: Gullah Gullah Island

Genre: Music Storytelling

Network: NICK

OKTV Appraisal:

OK 3

OK for 3 yrs. and older to view

Industry Rating:

TVY

Acceptable for children of all ages

OBSERVABLE CONTENT

V) Violence	NONE
H) Horror	NONE
I) Illegal/Harmful	Mischievous behavior with or without resolution is not understood by children under 3 years. Tipping over a wheel barrel, pulling flowers out of a garden bed.
S) Sexual	NONE
L) Language	NONE
N) Nudity	NONE

OKTV COMMENTS

- A live action musical program portraying an Island family from the Gullah Islands of the Carolina's and their friend "Binhya Binhya" (their native language for "little frog") a life-sized frog character in costume.
- The program is full of musical scenes where children and adults enjoy song and dance.
- Each episode focuses on a central issue or theme, such as problem-solving, sharing, creativity, or learning new skills.

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Program: She Stood Alone

Genre: Drama (Movie)

Network: DIS

OKTV Appraisal:

OKC8 OK for 8 yrs and older to Co-View with adults

Industry Rating:

No Rating

OBSERVABLE CONTENT

- | | |
|---------------------------|---|
| V) Violence | No negative consequences for violent physical acts. Use of whips, guns, rock throwing, young female is grabbed by adult male and whipped, destruction of a home with the intent to cause harm to occupants. |
| H) Horror | Music and camera angles are used to enhance scenes where there are threats, attacks or danger. |
| I) Illegal/Harmful | Acts of hatred and prejudice. Young boys using guns, whips, harassing young girls. Well water is poisoned, house set on fire, windows broken and glass cuts 2 people inside the house. White adult male whips young black female in public. |
| S) Sexual | NONE |
| L) Language | Abusive, derogatory racial and stereotypical statements are not repudiated. "Nigger, go back to Africa", "women are not equal to men". |
| N) Nudity | NONE |

OKTV COMMENTS

- A movie based on a true historical event the United States in 1832.
- Many violent and horrific scenes. Based on its educational value for middle childhood OKTV recommends their viewing only if adults co-view to mitigate the movie's context.
- The movie deals with the rights of Black people, the moral strength of their teacher and male dominance; issues that we are still coping with even today.

NOTE: *The OKTV Appraisal Process is organized to identify program content that places children at-risk of harm based on credible scientific and social research. The process produces a Content Report, explanatory descriptors, and an overall OKTV rating related to children's developmental stages. More in-depth reports regarding content information and the appraisal process for each appraised programs can be made available. Dissemination of these results are discussed in an OKTV document under preparation.*

Part II.

Overview of the OKTV Standards and the Appraisal Process

The OKTV Staff and its Advisory Board has literally utilized thousands of references in the development of the standards and appraisal process. A tremendous amount of research on media effects on development went into the process which has produced the most currently viable health-based system that can be available to parents across the nation.

OKTV standards and appraisal questions are grounded in a child development framework that uses the current knowledge of media effects on children's health and development. Where research is not available, this framework is combined with information on parental concerns about content outside generally accepted standards of decency.

The Standards are also organized around Six Harmful Content Categories:

- **VIOLENCE** : Depiction of the use of *physical force*, or serious intention to use force, *which injures, invades or violates the body of another feeling being or damages his/her property*. The depiction of the results or credible threat of such injury, invasion or damage. *Rape* is included in this category, as is any violence combined with sexual content.
- **HORROR** : Depictions which evoke *intense fear or revulsion*.
- **ILLEGAL/HARMFUL BEHAVIOR** : Overt depiction in action, language or story content of *behaviors and beliefs considered illegal, harmful, grossly socially irresponsible, including overt depiction of stereotyping, substance abuse, theft, dishonesty or dangerous risk-taking/thrill-seeking behavior*.
- **SEXUAL CONTENT** : Any *language or portrayal (including lyrics, dialogue, imagery or animation) of direct or implied sexual behavior, or any language or sound that is likely to stimulate sexual feelings in the viewer*.
- **LANGUAGE** : Words which are written, spoken, signed or combined in a way which *threatens or promotes harm* of a feeling being. Any combination which *promotes stereotyping or violent action*.
- **NUDITY** : The *non-sexualized* portrayal of the buttocks, genitalia or female breasts of a character. This includes the depiction of see-through blouses or other types of clothing that do not prevent visual exposure.

These content categories evolved from extensive reading and discussions among the OKTV Advisory Board and the OKTV Staff. The separation of Nudity from Sexual content was decided to provide allowances for the depiction of nudity in scenes of instruction, of other cultures and in situations that are generally accepted within our own culture (e.g., changing a baby's diaper, skinny dipping). However,

depictions of Nudity for the purposes of sexual stimulation is not acceptable. Illegal and Harmful behavior derived from our concern not to be moral censors, but to address the concern of children's premature exposure to activities which, if imitated, could cause physical and/or emotional harm. In defining "harmful activities," it was important to address specific observable behaviors grounded in research, and not be influenced by prevailing social perceptions.

Statements across all of our categories include references about stereotyping which could promote violence and antisocial, harmful action toward any identifiable group (e.g., gender, racial, cultural, ethnic, religious, ability, age). Also included are formal features of the television medium because young children use features such as music, pacing, and camera angles in processing television. Often, the formal features of a program will have more effect on children than does the content. In particular, attention is given to the audio sound track, sound levels, transformations and the speed of transitions.

The standards are also organized according to three stages of development that are universally accepted as milestones in children's ability to:

- understand content and to temporally integrate story elements;
- emotionally distance themselves from content;
- distinguish reality from appearance.

The three developmental stages in the organization of the standards are: children under 3 years (infants and toddlers), children 3-7 years (early childhood), and children 8-13 years (middle childhood). Younger viewers, for example, are more likely to have difficulty linking resolutions and consequences which appear in non-adjacent scenes.

- **The standards describe what children are able to view with low risk at various developmental levels, and recommended co-view levels with parents or caregivers. A "co-viewing" designation defines content which requires parents or adults to interpret or mediate so that misconceptions and potential disturbances are mitigated for their children.**
- **The Appraisal Filters are questions that are derived from the Standards that Appraisers use to rate and describe the content within the context of each appraised television program.**

OKTV's Appraisal Process

To date OKTV will appraise and rate all television programming designed for children up to age 13. Future revisions to the standards and the appraisal process will reflect those risks of harm that may affect teenagers as viewers. Because children also watch programs that are intended for "family" viewing and for adult audiences, OKTV will also appraise such programs that are of interest to children. OKTV appraisals and final ratings information are disseminated through print and electronic media to provide parents with health based assessments about the content of television programs that children may watch.

Television brings into all lives a wealth of information, and OKTV wants to help parents to understand this informational tool in ways that will help them foster their children's cognitive, physical, social and emotional development in safer and healthier ways. OKTV's standards and appraisal questions focus on how children's developmental stages are affected by what they view and hear on television. OKTV will make publicly available program appraisal reports. Such reports will inform TV producers, TV distributors, writers, advertisers, parents and others about content, that may harmfully effect a child's health and development. Broad dissemination of these appraisals and ratings will be to inform those concerned about television content and the way affects children.

It is the intent of OKTV to provide as much appropriate programming for children and families as possible. OKTV policies outline the rationale for the appraisal of programs that will or will not be subject to the OKTV appraisal process, and thus the appraisal process will determine whether and for which audience group a program is suitable. The standards are applied to programs that air from 6:00 a.m. until 9:00 p.m., and any other programs that producers identify as intended for children and families, including telecast movies that are rated "G" and "PG" by the Motion Picture Association of America (MPAA), and older films that are not rated. Programs that are identified in the research literature as having an appeal to young viewers, will also be appraised. Live telecasts such as sports events and newscasts will be pre-evaluated based upon the OKTV Standards and/or Advisor expert guidance.

Co-viewing is parent mediation of television which enhances children's understanding (Desmond, 1990) and mitigates objectionable and potentially harmful content (Singer, Singer, et al./ 1988; Eron., 1986). OKTV will designate "Coviewing" options in each of the three developmental stages (under 3 years, 3-7 years, and 8-13 years) whenever it is deemed that a child

should not view the program without parental guidance or when there is a program that is generally acceptable but contains some content that will require an adult to mediate. If the parent gives the child access, he or she should be committed to view with the child to help with the difficult content and to monitor the child's reaction during and after the program.

Modeled after the MPAA, the television industry's rating code identifies programs as appropriate for certain age groups (e.g., TV-Y: specifically for children of all ages; TV-14: parents are strongly cautioned). The program's code (assigned by the industry) itself appears on-screen for the first 15 seconds of the program. OKTV differs from the television industry's approach in several ways:

- OKTV addresses specific content that has been identified by social science and medical research as potentially harmful to children.
- OKTV ratings do not appear on the screen as "warning labels". Instead, they are electronically encoded to interact with available technology to allow "OK" programs to enter the home or to block "NOT OK" programs from appearing. Since OKTV ratings are not displayed on-screen, they do not attract the young viewer to programs that have been identified as inappropriate.
- With OKTV parents are always in control. They will be informed of the assigned OKTV rating through a variety of methods (e.g., print program guides and electronic means, an "800" telephone hotline, or a Web site). Parents will be able to decide whether to override the OKTV rating and allow their children to view programs.

By identifying and sorting out which programs will fall under the OKTV appraisal process guidelines, we will confine this immense task within children and family television viewing only. This is important to note, because OKTV will not be rating all of the programming that is currently being undertaken by the television industry. In order to develop a fuller complement of the OKTV appraised offering, we identify and prioritize genres that appeal to child viewers for our appraisals. **Television programs clearly designed and/or designated for children** such as Musicals, Puppetry, Cartoons, Dramas, Action-Adventure, Mystery, Educational, Science/Nature, News, Exercise, will be appraised first. **Television programs intended for family viewing and/or that are of interest to younger viewers** such as some Action Adventure, some Comedy Series, some Dramas, some Science/Nature Documentaries, and finally some Adult Instructional, will also be appraised.

The appraisal policies are organized by **genres** which contains a brief description and/or example of a type of program that would fall under that category; a **rationale** to outline OKTV's position in rating specific shows; and the OKTV's **appraisal policy** for such programs. In order

to provide new and fresh programs for their viewers, all appraisal policies are subject to revision since the television industry updates its content and format progressively, and/or to reflect new scientific knowledge about television and children's development.

Programs are appraised by several Appraisers viewing multiple episodes of the same program to build in assurance of a reliable rating and by implementing the appraisal questions. Episode rating and content information are entered into an OKTV database. All of this information is analyzed and contained in reports which are reviewed by OKTV staff for the final appraisal process who determine the final rating code.

The appraisal questions are derived from the standards to help appraisers rate and describe the program's content within its context. These questions reflect the developmental processes children would use to understand the message. Looking at more than one episode of a program is important to reach an overall program's rating that respects the integrity of the work.

OKTV's questions are arranged to obtain a "safe for children's viewing" result. When a question is answered, a level becomes apparent according to the amount of content observed in a given program. These results produce both informational advisories concerning the content found in each program and a child-based rating. This advisory and rating information will be made available to parents (writers, TV producers, TV distributors, advertisers) and others. OKTV obtains its final ratings through a series of steps and reviews.

1. All programs are appraised using all six content categories.
2. The program's most restrictive episode category code will indicate two things; the developmental level at which OKTV will designate the rating and will apprise OKTV of the overall content observed in that content category.
3. Ratings from episode to episode can vary. The program's most restrictive episode category code across all appraised episodes in a series determines the final code for that content category.
4. A program's OKTV final rating will be the most restrictive code obtained across all of the appraised episodes and the six content categories based on the content advisory information.

All OKTV codes are monitored by OKTV staff. Appraisers will also monitor their work and notify OKTV if they deem the need for a revised rating. OKTV will implement the option to override the working appraisal rating when we have sufficient reason and such overrides will produce a "*revised rating*." Parents, OKTV appraisal management staff in consultation with

Advisory Board members, the TV producer or other interested parties can appeal to override the program's rating. The override request will not guarantee that the program's code will change, but rather that an expert team with knowledge of the system, child health and development will have reviewed the merits of the program in question to determine its appropriate OKTV viewing audience.

OKTV Standards

Each OKTV standard is organized and written to address the individual aspect of each of the six content categories as they may be depicted in television programming. Therefore, for violence, horror, illegal and harmful behaviors, sexual content, language and nudity, all are written to capture each specific type of content and which are based heavily upon social science and scientific health knowledge.

There are Six Content-Focused Standards one for each content category and each standard contain:

- **a description of the content category;** for example: Violence the use of physical force, or serious intention to use force, which injures, invades or violates the body of another feeling being or damages his/her property. Violence also takes into account for the depiction of the results or credible threat of such injury, invasion or damage. Rape is included in this category, as is any violence combined with sexual content;
- **a series of Red Flags,** a term of warning that a show contains an act that is unsuitable for viewing by children under any viewing circumstances, for example: the presence of a Red Flag where severe violence is depicted as glamorous, enjoyable or as a form of amusement without a redeeming message or depiction of negative consequences;
- **a set of statements that identify the developmental level of the child as the viewer** and his or her ability to process the depictions in television programs/films with the intervention of an adult or parent during viewing to explain scenes which may be troublesome or emotionally difficult for some children to understand unaided, or in cases where children are mature enough to view alone;
- **criteria reflecting each of the six content categories** in a show that may possess acceptable levels of content, if the content allows for redeeming features including a depiction of the negative consequences where such content would incur. All of the resolutions of a specific type of content driven in a program must occur before the end of the show, and include clear and concise verbal/visual depictions of that resolution.

Appraisal Questions

Appraisal questions are used to rate and describe the content of a program to determine program's **content information** and to designate a recommended **developmental level** of acceptability. Appraisers view an entire episode answering all questions containing the six content categories. The questions are derived from the standards, thus they cross reference examples of content which may be found in children's television programs. A summarized description of these questions used in one content category is shown below.

The questionnaire is organized to first identify the need of any Red flags. In all of the six content categories there are a total of 26 Red Flags appraisers look for.

These are 6 examples of Red Flags (one from each content category):

- Is a rape depicted?
- Is blood shown pumping from orifices or limbs for reasons unrelated to instruction or historical events, or if related are the images gratuitously overemphasized?
- Are specific methods used for procuring, producing or using illegal substances depicted?
- Are overt and explicit acts of intercourse, oral or anal sex or fully nude caressing depicted?
- Are objectionable phrases used as a prelude to depict harmful action?
- Are the buttocks, genitalia or female breasts of a character glamorized, stylized or ridiculed?

For each content category, immediately following the Red Flag questions, are a set of content-driven questions that are written to address the specific developmental level of the child as the viewer. There are currently 64 questions not including the 26 Red Flags across all categories that appraisers apply for each appraised episode of a program. Depictions of these types of content may be allowed only at specific developmental levels, and only if such depictions are used as a catalyst to initiate the action and/or to drive a resolution, and thus do not glamorize or suggest that violence or any other type of content be used for amusement.

The questions **observe for content** which may promote the intent to:

- cause harm or permanent damage;
- induce fear or stressful emotions;
- induce imitation of illegal or risk-taking behavior;
- portray negative acts verbal or non-verbal toward individual races, sexes, religions, or ethnic or sexual orientation group;
- glamorize sexual activity, including unsafe or sex as a means of overpowering a person;
- allow racial, sexual, stereotyping or inflammatory terms or phrases to be used in negative and abusive ways without being repudiated;

- show nudity without an educational or instructional purpose, or nudity that does not advance the plot and/or is used for sexual stimulation.

All appraisers are required to submit final comments after completing the appraisal questions. These comments provide additional information which may be pertinent to the program's overall evaluation. This is a very important section of the appraisal process because it allows for the appraiser to fully state his or her evaluation of the overall content of the episode as they were reflected in the content category codes.

Appraisers may require an override of a program's overall rating. However they must provide information to support their request. The information must identify a rationale for such a request such as in the case if the program depicts historical events which may be accurate, and yet do not contain the resolution as required by the appraisal questions.

Terms used in the Standards and Appraisal Questions

OKTV has identified a set of terms and their definitions to clarify such terms contained within the standards and the appraisal questions. As defined, this terminology is not meant to be applied to other contexts. The current list contains 60 terms which are reviewed and updated as the appraisal develops. The terms are to define aspects of television that contribute to creating the potential for harm such as auditory levels, displacement from reality, harmful phrase, high levels of sexual activity, induced imitation, permanence of injury and total image of a character. A complete list of these terms and their definitions are available upon request.

Overview of the Manual for OKTV Appraisers

OKTV has written a manual for appraisers which serves as a starting point and will be further developed as the appraisal process becomes realized. Below is a copy of the table of contents of this manual to show the various sections and their components..

- Section 1:** OKTV Mission Statement
History and Background
- Section 2:** Creation and Organization of the Standards and Appraisal Filters
OKTV Television Program Rating System
Appraisal Policies; Policies for Programs, Not Subject to Appraisal,
Subject to Appraisal, Prioritization of Appraisals
- Section 3:** Appraisal Process; Rating Policies, Rating Decisions
- Section 4:** OKTV Appraisers; Qualifications
Appraisal Training Requirement
Provisional Contract/Endorsed OKTV Appraiser
Provisional and Intermittent Evaluations
Assignments
Billing Provisions
Quarterly Reports
- Section 5:** Six TV Content Categories for Appraisal
Definitions of Terms used in Standards and Filters
OKTV Standards
OKTV Appraisal Filters
- Section 6:** OKTV Staff, Advisory Board Members
- Section 7:** Appendices:
 - A -** Training Notification Letter
Provisional Appraiser Contract
Endorsed Appraiser Contract
Assignment Schedule
Appraisal Invoice
Procedures for completing the appraisal process
Appraiser's Quarterly Report
OKTV Provisional performance Evaluation
OKTV Intermittent Performance Evaluation
 - B -** Children and the Media Articles/Resources
 - C -** Bibliography